IN THE UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF PENNSYLVANIA

NUTRITION CORP, INC : 1-24-BK-01672

d/b/a FRESHNLEAN :

Debtors : Chapter 7

.

BRIDGE LEASING GROUP, LLC :

Movant

.

V.

:

KARA K. GENDRON, Trustee

Respondent

MOTION TO REJECT EQUIPMENT LEASE WITH CONCURRENCE

AND NOW comes BRIDGE LEASING GROUP, LLC, by its attorney, Steven M. Carr, Esquire, of the law firm of Ream, Carr, Markey, Woloshin & Hunter, LLP, and files this Motion for Relief from Stay as follows:

- 1. Movant is BRIDGE LEASING GROUP, LLC.
- 2. Respondent is the Chapter 7 Trustee, KARA K. GENDRON.
- 3. On or about April 27, 2023, Movant and the Debtor entered into a Master Lease Agreement for a Spiral Oven and components with a value of over \$2,888,080.00 and an Incline Conveyor and Rotary Drum Blancher valued at \$313,910.00.
- 4. The Lease obligated Debtor to make monthly payments of \$89,044.00 and \$10,378.00, respectively.
 - 5. Debtor was in default of its obligations prior to the filing of the bankruptcy petition.
- 6. Movant has requested Trustee to reject the lease pursuant to section 365 in order to reclaim possession of the depreciating equipment assets and Trustee has agreed to do so.

WHEREFORE, Movant requests that the Court enter an order confirming the Trustee's rejection of the unexpired equipment lease between Debor and Movant, Bridge Leasing Group, LLC.

Ream, Carr, Markey, Woloshin & Hunter, LLP

/S/ Steven M. Carr Steven M. Carr, Esquire 119 East Market Street York PA 17401 (717) 843-8968 I.D. No. 34336